

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

STARTER HOMES DEFENDANTS' MOTION IN LIMINE

Pursuant to the Federal Rules of Evidence, the Federal Rules of Civil Procedure, and the Court’s orders, Defendants Starter Programs Homes, Inc., d/b/a renttoownhomefinder.com and Lending Cloud Homes; Starter Home Investing, Inc., d/b/a renttoownhomefinder.com and Lending Cloud Homes; Xanadu Marketing, Inc., individually (assumed name Apex Page Builder), d/b/a cloudbasedpersonalloans.com and xanadutrucking.com; and Insurance-Reviewed.com (collectively hereinafter, “Starter Homes Defendants” or “Defendants”) hereby move *in limine*, asking for an order precluding plaintiff, Tammy McCrae-Coley, from introducing evidence concerning, or arguing, the following:

- a) Plaintiff's late-disclosed evidence;
- b) Any alleged actual injury or harm (including physical, psychological/emotional, and economic harm) to Plaintiff;

- c) Settlement discussions among the parties;
- d) Joe Delfgauw's real estate licenses; and
- e) "Sending a message" or invoking the Golden Rule.

For support, Defendants rely on their contemporaneously filed memorandum of law and the accompanying exhibits.

WHEREFORE, the Starter Home Defendants respectfully ask that their motion *in limine* be granted.

Respectfully submitted, this the 18th day of January, 2023.

/s/B. Tyler Brooks
B. Tyler Brooks (N.C. Bar No. 37604)
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Counsel for Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was filed with the Court's CM/ECF system on January 18, 2023, which will send an electronic copy to the plaintiff and that a copy was also served via email and First Class U.S. mail at the address below.

/s/B. Tyler Brooks
B. Tyler Brooks

SERVED:

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Pro se Plaintiff